

The Law Offices of Avrum J. Rosen, PLLC
Proposed Attorneys for Debra Kramer, Trustee
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Fred S. Kantrow

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF NEW YORK

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In re:

Shahara Khan,

Chapter 7

Case No.: 10-46901-ess

Debtor.

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**APPLICATION FOR RETENTION
OF THE LAW OFFICES OF AVRUM J. ROSEN, PLLC
AS ATTORNEYS FOR THE CHAPTER 7 TRUSTEE**

**TO: THE HONORABLE ELIZABETH S. STONG
UNITED STATES BANKRUPTCY JUDGE**

The application (the "Application") of Debra Kramer, the Chapter 7 Trustee (the "Trustee") appointed for the estate of Shahara Khan (the "Debtor"), respectfully represents as follows:

1. On July 22, 2010, the Debtor filed a voluntary petition for relief pursuant to Chapter 7 of Title 11 of the United States Code (the "Bankruptcy Code").
2. Debra Kramer was appointed the interim Chapter 7 Trustee and has since qualified and is permanent Chapter 7 Trustee in this case.
3. The Trustee requires the services of counsel to assist in the investigation of the Debtor's financial affairs and assets. According to the Debtor's Petition and Schedules, the Debtor owned an interest in certain real property commonly known as 87-27 1120th Street, Richmond Hill, New York (the "Premises"). It appears from the Trustee's investigation that the Premises was sold on or about April 5, 2007. A review of the closing statement with respect

to the sale of the Premises indicates that while the Debtor had a one-third interest in the property, she received none of the proceeds of the sale. The estate may have a cause of action to recover the amounts that would otherwise have been due the Debtor upon closing.

4. The Trustee desires to retain The Law Offices of Avrum J. Rosen, PLLC, as her attorneys herein.

5. The Trustee has selected said attorneys because they are familiar with bankruptcy practice and are well qualified to act in the capacity as attorneys for the Trustee.

6. It is necessary for the Trustee to employ attorneys to render professional services, including but not limited to, the following:

- (a) Conduct examinations of the Debtor and various witnesses as to the acts, conduct and property of the Debtor herein;
- (b) Prepare numerous applications and reports, for which attorneys' services will be necessary; and
- (c) Conduct and investigation to discover all possible assets and reduce the same to cash.

7. To the best of the Trustee's knowledge, The Law Offices of Avrum J. Rosen, PLLC, have no connection with the Debtor, or any other party in interest or their respective attorneys.

8. To the best of the Trustee's knowledge, The Law Offices of Avrum J. Rosen, PLLC, represent no interest adverse to the Trustee or to the estate in the matter which it is to be engaged herein, and its employment would be to the best interests of the estate.

9. Consistent with full disclosure herein, the Trustee notes that The Law Offices of Avrum J. Rosen, PLLC, currently represent Thomas Donovan and his wife Pamela Donovan in a

pending chapter 7 case, in which Debra Kramer is the chapter 7 Trustee, which case is currently pending before the Hon. Carla E. Craig, Chief United States Bankruptcy Judge. Moreover, this Court served as the mediator in various adversary proceedings associated with the Donovan chapter 7 case.

WHEREFORE, the Trustee prays for the entry of an Order, substantially in the form of the proposed Order annexed hereto, for which no previous application has been made.

Dated: Great Neck, New York
November 28, 2011

/s/ Debra Kramer, Trustee
Debra Kramer, Trustee